



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

November 3, 2014

Jerry Ingersoll  
Siuslaw National Forest  
3200 SW Jefferson Way  
Corvallis, Oregon 97331

Re: EPA Region 10 Comments on the Oregon Dunes NRA Management Area 10 (C) Designated Routes Project Final Environmental Impact Statement (FEIS)

Dear Mr. Ingersoll:

The EPA has reviewed the final EIS for the Oregon Dunes National Recreation Area (ODNRA) 10 (C) Designated Routes Project. Our comments are provided in accordance with our responsibilities and authorities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

The FEIS provides a refined analysis of the no action and the four action alternatives presented in the draft EIS. The FEIS also analyzes a modified Alternative 4, which is identified as the Preferred Alternative. Modified Alternative 4 would designate 2.3 miles of Off Highway Vehicle (OHV) routes and reallocate 518 acres from Management Area 10 (C) (Off Road Vehicle on Designated Routes) to Management Area 10 (B) (Open to Off Road Vehicles). This alternative would also close 83 miles of existing user-developed routes within Management Area 10 (C).

In our December, 2012 comments on the Draft EIS, the EPA noted that there is a high risk of introducing or spreading invasive species associated with reallocating areas from Management Area 10 (C) to Management Area 10 (B). Given that risk, we encouraged the Forest to elaborate on measures that would be used to control invasives within the Project Design Criteria. The Botany Design Criteria at page 62 of the FEIS remain general in nature, stating that invasive plants species within MA 10 (B) will be controlled "by the most effective means allowed." We appreciate that dunes restoration is outside the scope of this project; however, we maintain that it is appropriate to identify specific management measures that will be employed to address risks associated with the project. Given the existing high priority infestations, and the risk of introduction and/or spread within the proposed MA 10 (B) area, we believe it would be appropriate to include a discussion of specific invasive management strategies within the Record of Decision.

We also want to acknowledge the helpful information in your response to comments related to dunes restoration. We encourage the Forest to continue to engage OHV recreation and conservation partners on short-term, site specific restoration projects, and we are very supportive of the Forest's ongoing efforts to develop a long-term, broad-based dunes restoration strategy.

Overall, we are supportive of Modified Alternative 4. We believe this alternative provides an understandable, enforceable motorized trail system that is safe and responsive to public needs and

desires. Alternative 4 also addresses potential confusion over management area types, which should assist with user acceptance and compliance. As the Forest moves forward with implementation, we encourage the active monitoring of route closures, and the use of that information to target enforcement and trail resources (for the installation of additional signs/barricades).

We appreciate the opportunity to provide comments on this final EIS. Please contact me with any questions at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Teresa Kubo of my staff at (503) 326-2859 or [kubo.teresa@epa.gov](mailto:kubo.teresa@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

